

December 18, 2009

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RE: Gulfco Marine Maintenance, Inc. Site – Freeport, Texas

Dear Tom:

Thank you for your December 9, 2009 letter.

The Gulfco Group agrees to conduct the tank removal and cap work under an administrative order on consent, and accordingly is preparing comments to the draft Administrative Order on Consent which you attached in your letter. After EPA has had the opportunity to review the comments, we can evaluate the need for and timing of a meeting to discuss the comments and finalizing the order.

Sincerely,



F. William Mahley

FWM/ksb

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December 18, 2009  
Page 2

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